

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:
CITY OF DETROIT, MICHIGAN,

Debtor

Chapter 9
Case No. 13-53846
Hon. Steven W. Rhodes

**RUSS BELLANT'S SECOND RESPONSE AND OBJECTIONS TO NOTICE OF
COMMENCEMENT OF CASE UNDER CHAPTER 9, NOTICE OF
AUTOMATIC STAY AND PURPOSES OF CHAPTER 9, NOTICE OF
DEADLINE AND PROCEDURES FOR FILING OBJECTIONS TO THE
CHAPTER 9 PETITION AND NOTICE OF CITY'S MOTION TO LIMIT
NOTICE**

Russ Bellant, for his Second Response and Objections, respectfully states:

1. The announcement of Emergency Manager Kevyn Orr's intention to outsource trash pickup in the context of these bankruptcy proceedings limits the public review that is needed to evaluate Orr's claims of benefits from outsourcing. These bankruptcy proceedings should allow challenges to the claims of the Emergency Manager should the outsourcing of trash hauling commence after today's date.
2. The Notice provides inadequate notice and opportunity to be heard by the date of August 19, 2013 when objections may be filed, according to its terms. The Notice was not received until August 12, 2013.

In support of these objections, Russ Bellant asserts the following:

3. That the loss of City employees and publicly owned assets related to the City's waste hauling function means that near-irremediable harm will be done by the plan to outsource waste hauling.
4. That the public should be fully engaged in the review of all data and decision-making related to this outsourcing plan, including any legal proceedings that may be necessary to further public review and accountability. Given the tainted history of this industry, the public should be able to challenge the selection of any vendor associated with criminal elements.
5. The stated plan to outsource trash hauling will have the following deleterious effects on the financial condition of the City of Detroit and its General Pension Fund, including:

- a) The City will be bound after the loss of City employees and publicly owned trash hauling assets to higher priced vendors in succeeding years of the outsourcing plan.
- b) The City will terminate employment for several hundred DPW employees, further undermining the employee base that supports the General Pension Fund.

WHEREFORE, Russ Bellant respectfully requests that this court does not allow Governor Rick Snyder, Treasurer Andy Dillon or Emergency Manager Kevyn Orr to use the captioned bankruptcy proceedings to uncritically accept the claims of the Emergency Manager regarding outsourcing trash hauling and allow public review and, when necessary, public interventions, to determine the consequences of this proposed outsourcing plan.

Respectfully submitted,

Russ Bellant 

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Dated: August 19, 2013